

1 **BRIAN WILLIAM**
2 3802 ROSECRANS STREET, UNIT #22
3 SAN DIEGO, CALIFORNIA 92110

4
5 **In Propria Persona**, individually and on behalf
6 Of all other persons and class similarly situated,

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

JUN 02 2023

David W. Slayton, Executive Officer/Clerk of Court

5 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
6 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

7
8 **BRIAN WILLIAM**, individually, on behalf of
9 himself, the general public and on behalf of all
10 other persons and class similarly situated,

11 Plaintiff,

12 v.

13 **FIRSTGROUP AMERCIA, INC.**, a Delaware
14 Corporation, individually, dba: FIRSTGROUP
15 AMERICA, INC., a California Corporation,
16 (#C3159595) individually, aka: FIRSTGROUP
17 PLC, dba: First Student; First Transit; Greyhound;
18 First Bus; First Rail, individually; **FIRST**
19 **TRANSIT, INC.**, a Delaware Corporation,
20 individually, dba: FIRST TRANSIT, INC., a
21 California Corporation, (#C0827053) individually,
22 aka: FIRSTGROUP AMERCIA, INC., a Delaware
23 Corporation, individually, dba: FIRSTGROUP
24 AMERICA, INC., a California Corporation,
25 (#C3159595) individually, aka: FIRSTGROUP
26 PLC, dba: First Student; First Transit; Greyhound;
27 First Bus; First Rail, individually; a Subsidiary of
28 **FIRSTGROUP AMERICA, INC., THE PARENT**
 ORGANIZATION, individually; **GREYHOUND**
 LINES, INC., a Delaware Corporation,
 individually, dba: GREYHOUND LINES, INC., a
 California Corporation, (#C1584484) individually,
 aka: FIRSTGROUP AMERCIA, INC., a Delaware
 Corporation, individually, dba: FIRSTGROUP
 AMERICA, INC., a California Corporation,
 (#C3159595) individually, aka: FIRSTGROUP
 PLC, dba: First Student; First Transit; Greyhound;
 First Bus; First Rail, individually; a Subsidiary of
 FIRSTGROUP AMERICA, INC., THE PARENT
 ORGANIZATION, individually; **AMERICANOS**)

[UNLIMITED JURISDICTION]

Case No.: 21STCV17514

FIRST AMENDED COMPLAINT FOR
DAMAGES AND DEMAND FOR JURY
TRIAL

1. Violation of the American with Disability
Act of 1990, 42 U.S.C. §12101, et seq.
2. Violation of 42 U.S.C. A. §12182(a);
3. Violation of Fourteenth Amendment (Equal
Protection and Due Process);
4. Intentional or Reckless Infliction of
Emotional Mental Distress and Duress
5. Intentional Infliction of Emotional Distress;
6. Negligent Infliction of Emotional Distress;
7. Intentional Interference of Emotional
Tranquility;
8. Negligent Interference of Emotional
Tranquility;
9. Conspiracy;
10. Aiding and Abetting;
11. Intentional Fraudulent Misrepresentation;
12. FRAUDULENT MISREPRESENTATION;
13. NEGLIGENT MISREPRESENTATION;
14. Fraudulent Concealment;
15. Intentional Fraud and Deceit (C.C. §1710)
16. Fraudulent Misrepresentation-Promissory
Fraud
17. Promissory Estoppel
18. Negligence;
19. Breach of Oral/Written Agreement;
20. Intention Misrepresentation of Fact
21. Negligence;

1 U.S.A., L.L.C., a Delaware Corporation,)
2 individually, dba: AMERICANOS U.S.A., L.L.C.,)
3 a Limited Liability Corporation, (#199917210008))
4 individually, aka: GREYHOUND LINES, INC., a)
5 California Corporation, (#C1584484) a Subsidiary)
6 of GREYHOUND LINES, INC., THE PARENT)
7 ORGANIZATION, individually; BRADLEY)
8 THOMAS, individually, and in his official)
9 capacity as CEO of FIRST TRANSIT INC., a)
10 Delaware Corporation, individually, dba: FIRST)
11 TRANSIT, INC., California Corporation,)
12 individually; DAVID S. LEACH, individually,)
13 and in his official capacity as CEO of both)
14 GREYHOUND LINES, INC., a Delaware)
15 Corporation, individually, dba: GREYHOUND)
16 LINES, INC., a California Corporation,)
17 individually, and in his official capacity as CEO of)
18 AMERICANOS U.S.A., L.L.C., a Delaware)
19 Corporation, individually, dba: AMERICANOS)
20 U.S.A., L.L.C., a Limited Liability Corporation,)
21 individually, aka: GREYHOUND LINES, INC., a)
22 Subsidiary of GREYHOUND LINES, INC., THE)
23 PARENT ORGANIZATION, individually; JOSE)
24 LUIS MORENO, individually, and in his official)
25 capacity as CEO of AMERICANOS U.S.A., L.L.C.,)
26 a Delaware Corporation, individually, dba:)
27 AMERICANOS U.S.A., L.L.C., a Limited Liability)
28 Corporation, individually, aka: GREYHOUND)
29 LINES, INC., a Subsidiary of GREYHOUND)
30 LINES, INC., THE PARENT ORGANIZATION,)
31 individually; JANE DOE GREYHOUND BUS)
32 DRIVER, individually and in her official capacity)
33 as a Greyhound Employee and as the bus Operator)
34 who drove the Greyhound Bus No. # 60587 with a)
35 Lic. Plate #CP70527 on November 20, 2018 from)
36 San Diego, Ca. Greyhound Station to Downtown)
37 Los Angeles, Ca. Greyhound Bus Sta. between)
38 3:00pm and 10:00pm individually; JANE DOE)
39 GREYHOUND SUPERVISOR, individually, and)
40 in her official capacity as a Greyhound Employee)
41 who was on duty working on November 20, 2018)
42 at the Los Angeles, Ca. Greyhound Bus Sta. who)
43 had authority over Jane Doe Bus Dr. of Bus No. #)
44 60587 with a Lic. Plate #CP70527 to direct her)
45 actions as described herein individually; and)
46 DOES 1 through 200, inclusive, Defendants,)
47)
48 22. Violation of Bane Act (C.C. §52.1 and 52))
49 23. Violation of Ralph Act (C.C. §51.7 and 52))
50 24. Unruh Civil Rights Act (Civ. C. §51 and 52))
51 25. Deprivation of 42 USCA §1983 Civil Rights)
52 26. Violation of Federal Civil Rights Act;)
53 27. Unfair and Fraudulent Business Practices)
54 [B&P Code §17200 et seq.])
55 28. Deliberate Indifference)
56 29. Public Nuisance (C.C. §§3479, 3480, 3481))
57 30. NEGLIGENT ENTRUSTMENT)
58 31. FOR NEGLIGENCE HIRING, TRAINING,)
59 SUPERVISION AND/OR RETENTION)

1 PLAINTIFF, BRIAN WILLIAM, complains and alleges as follows:

2 **COMMON FACTUAL ALLEGATIONS INCORPORATED IN EACH CAUSE OF ACTION**

- 3 1. This is an action brought by Plaintiff, WILLIAM, pursuant to California statutory,
4 decisional and regulatory laws.
- 5 2. PLAINTIFF alleges that California statutory, decisional and regulatory laws prohibit the
6 conduct by Defendants herein alleged and therefore Plaintiff is and has entitlement to monetary
7 relief on the basis that Defendants violated such statutes, decisional laws and regulations.
- 8 3. COME NOW PLAINTIFF, WILLIAM, and alleges the following against the Defendants
9 **FIRSTGROUP AMERCIA, INC.**, a Delaware Corporation, individually, **dba**: FIRSTGROUP
10 AMERICA, INC., a California Corporation, (#C3159595) individually, **aka**: FIRSTGROUP
11 PLC, **dba**: First Student; First Transit; Greyhound; First Bus; First Rail, **individually**; **FIRST**
12 **TRANSIT, INC.**, a Delaware Corporation, individually, **dba**: FIRST TRANSIT, INC., a
13 California Corporation, (#C0827053) individually, **aka**: FIRSTGROUP AMERCIA, INC., a
14 Delaware Corporation, individually, **dba**: FIRSTGROUP AMERICA, INC., a California
15 Corporation, (#C3159595) individually, **aka**: FIRSTGROUP PLC, **dba**: First Student; First
16 Transit; Greyhound; First Bus; First Rail, individually; a Subsidiary of FIRSTGROUP
17 **AMERICA, INC., THE PARENT ORGANIZATION**, **individually**; **GREYHOUND LINES,**
18 **INC.**, a Delaware Corporation, individually, **dba**: GREYHOUND LINES, INC., a California
19 Corporation, (#C1584484) individually, **aka**: FIRSTGROUP AMERCIA, INC., a Delaware
20 Corporation, individually, **dba**: FIRSTGROUP AMERICA, INC., a California Corporation,
21 (#C3159595) individually, **aka**: FIRSTGROUP PLC, **dba**: First Student; First Transit;
22 Greyhound; First Bus; First Rail, individually; a Subsidiary of FIRSTGROUP AMERICA, INC.,
23 **THE PARENT ORGANIZATION**, **individually**; **AMERICANOS U.S.A., L.L.C.**, a Delaware
24 Corporation, individually, **dba**: AMERICANOS U.S.A., L.L.C., a Limited Liability
25 Corporation, (#199917210008) individually, **aka**: GREYHOUND LINES, INC., a California
26 Corporation, (#C1584484) a Subsidiary of GREYHOUND LINES, INC., **THE PARENT**
27 **ORGANIZATION**, **individually**; **BRADLEY THOMAS**, individually, and in his official
28 capacity as CEO of FIRST TRANSIT INC., a Delaware Corporation, individually, **dba**: FIRST
TRANSIT, INC., California Corporation, **individually**; **DAVID S. LEACH**, individually, and
in his official capacity as CEO of both GREYHOUND LINES, INC., a Delaware Corporation,

1 individually, **dba:** GREYHOUND LINES, INC., a California Corporation, individually, and in
 2 his official capacity as CEO of AMERICANOS U.S.A., L.L.C., a Delaware Corporation,
 3 individually, **dba:** AMERICANOS U.S.A., L.L.C., a Limited Liability Corporation,
 4 individually, **aka:** GREYHOUND LINES, INC., a Subsidiary of GREYHOUND LINES, INC.,
 5 THE PARENT ORGANIZATION, individually; JOSE LUIS MORENO, individually, and in
 6 his official capacity as CEO of *AMERICANOS U.S.A.. L.L.C.*, a Delaware Corporation,
 7 individually, **dba:** *AMERICANOS U.S.A., L.L.C., a Limited Liability* Corporation, individually,
 8 **aka:** GREYHOUND LINES, INC., a Subsidiary of GREYHOUND LINES, INC., THE
 9 PARENT ORGANIZATION, individually; JANE DOE GREYHOUND BUS DRIVER,
 10 individually and in her official capacity as a Greyhound Employee and as the bus Operator who
 11 drove the Greyhound Bus No. # 60587 with a Lic. Plate #CP70527 on November 20, 2018 from
 12 San Diego, Ca. Greyhound Station to Downtown Los Angeles, Ca. Greyhound Bus Sta. between
 13 3:00pm and 10:00pm individually; JANE DOE GREYHOUND SUPERVISOR, individually,
 14 and in her official capacity as a Greyhound Employee who was on duty working on November
 15 20, 2018 at the Los Angeles, Ca. Greyhound Bus Sta. who had authority over Jane Doe Bus Dr.
 16 of Bus No. # 60587 with a Lic. Plate #CP70527 to direct her actions as described herein
 17 individually; and DOES 1 through 200, inclusive, Defendants,

18 4. Plaintiff is and at all times mentioned is a citizen of the State of California and at all times
 19 mentioned in this complaint Plaintiff is and was at said time of the stated alleged facts herein a
 20 resident of the City of Los Angeles, in the County of Los Angeles, in the State of California.

21 5. That the true names and capacities, whether individual, plural, corporate, partnership,
 22 associate or otherwise, of defendants sued herein as DOES 1 through 200. Inclusive, are
 23 presently unknown to Plaintiff, who has reason to believe that each of said Defendants was and
 24 at all times herein mention acting with the course, scope, and purpose of said agency,
 25 employment, business enterprise and joint venture in some manner, responsible for the incident,
 26 injuries and damages hereinafter alleged and who therefore sue said Defendants by such
 fictitious names. At this time Plaintiff is unaware of the exact identity of the DOE(S)
 DEFENDANTS. Plaintiff shall seek leave of the court to amend this complaint to show the true
 names and capacities of said defendants when ascertain.

27 6. Plaintiff is informed and believes and based thereon alleges that the negligently,
 28 recklessly, intentionally, tortuously, and unlawfully responsible in some wilful [W]anton manner

for the events and happenings and the above-mention malicious conduct herein referred to and negligently, recklessly, intentionally, tortuously, unlawfully committed all reprehensibility [overt acts] or omissions to act, were the legal (proximate) cause of injuries and damages to plaintiff by the Defendants extreme recklessness negligent overt actions that were committed with maliciousness through vile conduct mentioned above and acted with malice and oppression with the intent to vex, annoy, frighten, and injure the Plaintiff intentionally, and purposely by Fraudulent Concealment and Fraudulently Misrepresentations of the true facts as a whole (not in-part) which further and legally caused injury and damages thereby hereinafter alleged to which caused directly Plaintiff, to sustained his injures as herein alleged and are therefore responsible for their own conduct to which attributed to the Defendants actions for the events and happenings herein referred to and the injuries and damages there by to Plaintiff as herein alleged that was not the personal conduct of an individual defendant and was the personal conduct of agents, servants, partners, independent contractor, co-venturer, co-tortfeasor, employers and employees of said defendant(s) and each of the remaining defendants, and acted at all times of each other and were acting within the course, purpose and scope of said agency, and employment, independent contractors, or service and with the permission and consent of each other Defendants and in said capacity along with each of them in their individual capacities and employment therefore to which is liable in some manner and that such negligent conduct was authorized or ratified by said defendants' and in the case of any corporate defendant engaged is authorized or ratified such conduct to which caused damages directly to Plaintiff, complained thereof herein this Complaint. Plaintiff is alleging causes of action against each DOE Defendant under every theory of recovery and /or cause of action set forth below which caused directly Plaintiff, WILLIAMS to sustained his injuries.

7. Plaintiff, WILLIAM, alleges causes if action against Defendants:

A. FIRSTGROUP AMERCIA, INC., a Delaware Corporation, individually, **dba:**

FIRSTGROUP AMERICA, INC., a California Corporation, (#C3159595) individually,
aka: FIRSTGROUP PLC, **dba:** First Student; First Transit; Greyhound; First Bus; First Rail, **individually;**

B. FIRST TRANSIT, INC., a Delaware Corporation, individually, **dba:** FIRST

TRANSIT, INC., a California Corporation, (#C0827053) individually, **aka:**

FIRSTGROUP AMERCIA, INC., a Delaware Corporation, individually, **dba:**

1 FIRSTGROUP AMERICA, INC., a California Corporation, (#C3159595) individually,
2 **aka:** FIRSTGROUP PLC, **dba:** First Student; First Transit; Greyhound; First Bus; First
3 Rail, individually; a Subsidiary of FIRSTGROUP AMERICA, INC., THE PARENT
4 ORGANIZATION, individually;

5 **C. GREYHOUND LINES, INC.**, a Delaware Corporation, individually, **dba:**
6 GREYHOUND LINES, INC., a California Corporation, (#C1584484) individually,
7 **aka:** FIRSTGROUP AMERCIA, INC., a Delaware Corporation, individually, **dba:**
8 FIRSTGROUP AMERICA, INC., a California Corporation, (#C3159595) individually,
9 **aka:** FIRSTGROUP PLC, **dba:** First Student; First Transit; Greyhound; First Bus; First
10 Rail, individually; a Subsidiary of FIRSTGROUP AMERICA, INC., THE PARENT
ORGANIZATION, individually;

11 **D. AMERICANOS U.S.A., L.L.C.**, a Delaware Corporation, individually, **dba:**
12 AMERICANOS U.S.A., L.L.C., a Limited Liability Corporation, (#199917210008)
13 individually, **aka:** GREYHOUND LINES, INC., a California Corporation,
14 (#C1584484) a Subsidiary of GREYHOUND LINES, INC., THE PARENT
15 ORGANIZATION, individually;

16 **E. BRADLEY THOMAS**, individually, and in his official capacity as CEO of FIRST
17 TRANSIT INC., a Delaware Corporation, individually, **dba:** FIRST TRANSIT, INC.,
18 California Corporation, individually;

19 **F. DAVID S. LEACH**, individually, and in his official capacity as CEO of both
GREYHOUND LINES, INC., a Delaware Corporation, individually, **dba:**
20 GREYHOUND LINES, INC., a California Corporation, individually, and in his official
21 capacity as CEO of AMERICANOS U.S.A., L.L.C., a Delaware Corporation,
22 individually, **dba:** AMERICANOS U.S.A., L.L.C., a Limited Liability Corporation,
23 individually, **aka:** GREYHOUND LINES, INC., a Subsidiary of GREYHOUND
24 LINES, INC., THE PARENT ORGANIZATION, individually;

25 **G. JOSE LUIS MORENO**, individually, and in his official capacity as CEO of
AMERICANOS U.S.A., L.L.C., a Delaware Corporation, individually, **dba:**
26 AMERICANOS U.S.A., L.L.C., a Limited Liability Corporation, individually, **aka:**
27 GREYHOUND LINES, INC., a Subsidiary of GREYHOUND LINES, INC., THE
28 PARENT ORGANIZATION, individually;

1 **H. JANE DOE GREYHOUND BUS DRIVER**, individually and in her official capacity
2 as a Greyhound Employee and as the bus Operator who drove the Greyhound Bus No.
3 **# 60587 with a Lic. Plate #CP70527 on November 20, 2018 from San Diego, Ca.**
4 Greyhound Station to Downtown Los Angeles, Ca. Greyhound Bus Sta. between
5 3:00pm and 10:00pm **individually**;

6 **I. JANE DOE GREYHOUND SUPERVISOR**, individually, and in her official capacity
7 as a Greyhound Employee who was on duty working on November 20, 2018 at the Los
8 Angeles, Ca. Greyhound Bus Sta. who had authority over Jane Doe Bus Dr. of Bus No.
9 **# 60587 with a Lic. Plate #CP70527 to direct her actions as described herein**
10 **individually**;

11 **J. and DOES 1 through 200, inclusive,**

12 8. Each Defendant named above is a natural person except Defendants(s):

13 a) **FIRSTGROUP AMERCIA, INC.**, a Delaware Corporation, individually, **dba:**
14 **FIRSTGROUP AMERICA, INC.**, a California Corporation, (#C3159595) individually,
15 **aka: FIRSTGROUP PLC, dba: First Student; First Transit; Greyhound; First Bus; First**
16 **Rail, individually**;

17 b) **FIRST TRANSIT, INC.**, a Delaware Corporation, individually, **dba: FIRST TRANSIT,**
18 **INC., a California Corporation, (#C0827053) individually, aka: FIRSTGROUP**
19 **AMERCIA, INC., a Delaware Corporation, individually, dba: FIRSTGROUP**
20 **AMERICA, INC., a California Corporation, (#C3159595) individually, aka:**
21 **FIRSTGROUP PLC, dba: First Student; First Transit; Greyhound; First Bus; First Rail,**
22 **individually; a Subsidiary of FIRSTGROUP AMERICA, INC., THE PARENT**
23 **ORGANIZATION, individually**;

24 c) **GREYHOUND LINES, INC.**, a Delaware Corporation, individually, **dba:**
25 **GREYHOUND LINES, INC., a California Corporation, (#C1584484) individually, aka:**
26 **FIRSTGROUP AMERCIA, INC., a Delaware Corporation, individually, dba:**
27 **FIRSTGROUP AMERICA, INC., a California Corporation, (#C3159595) individually,**
28 **aka: FIRSTGROUP PLC, dba: First Student; First Transit; Greyhound; First Bus; First**
 Rail, individually; a Subsidiary of FIRSTGROUP AMERICA, INC., THE PARENT
 ORGANIZATION, individually;

d) AMERICANOS U.S.A., L.L.C., a Delaware Corporation, individually, dba: AMERICANOS U.S.A., L.L.C., a Limited Liability Corporation, (#199917210008) individually, aka: GREYHOUND LINES, INC., a California Corporation, (#C1584484) a Subsidiary of GREYHOUND LINES, INC., THE PARENT ORGANIZATION, individually;

9. JOHN DOES(S) and/or JANE DOE(S) defendants: 1-200 are persons who capacities are unknown currently to plaintiff at the time of filing.

10. This court is the proper court because injury to person or damage to personal property occurred in its jurisdictional area.

11. Plaintiff is informed and believes and based upon such information and belief thereon alleges that all Defendants sued herein DOES are in some manner responsible for the acts herein alleged.

12. At all times herein mentioned, JOHN DOE(S) AND/OR JANE DOE(S) (herein referred to as the Defendants) is and at all times mentioned as a form unknown to Plaintiff doing business in the County of Los Angeles, State of California.

13. As a direct and proximate result of the wrongful acts and omissions of the Defendants complained of herein the Defendants are liable to Plaintiff for damages in the sum of more than (Fifty Million Dollars) \$50,000,000.00¢

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff, **BRIAN WILLIAM**, prays for an additional judgment against the Defendants, each of them, jointly and severally, awarding him statutory damages, general, special, punitive, compensatory, treble, special and consequential damages, monetary, nominal, exemplary, economical, non-economic damages and for cost of suit herein, Pre-judgment interest, at the legal rate of **10% per annum from 11/20/2018 thru 11/20/2018** for attorney fee as provided by Government Code Section § 12965 (b); 42 U.S.C. §§12101 and 12102 et seq., California **Civil Code §3294 et seq.**, For attorney fee as provided by law and by 42 U.S. C. 1983, §§1985-1988, and California **Civil Code §52 and §3294 et seq.**, in an amount sufficient to deter any further future herein acts and to make an example out of Defendants and DOES 1 through 200 and for such other and further relief as the court may deem just and proper as well as damages in the amount of **(Fifty Million Dollars) \$50,000,000.00¢** and

PLAINTIFF DEMANDS A TRIAL BY JURY.

1 a) WHEREFORE, the Plaintiff, BRIAN WILLIAM, prays for an additional judgment against the
2 Defendants, each of them, jointly and severally, awarding him statutory damages, general,
3 special, punitive, compensatory, treble, special and consequential damages, monetary, nominal,
4 exemplary, economical, non-economic damages and for cost of suit herein, Pre-judgment
5 interest, pursuant to Civil Code §3291 at the legal rate of **10% per annual from 11/20/2018**
6 thru 11/20/2018 and Now at the time of this filing or Pursuant to Code of Civil Procedure
7 §§3287-3289 and §3291; For Attorney Fees as provided by law and by Government Code
8 Section §12965 (b); 42 U.S.C. §1983 and Sections §§1985-1988; §§ 12101 and 12102 et seq.,
9 as well as other damages as cited above-herein for a Civil Penalty of **\$25,000.00** pursuant to
10 Civ. Code. §52. (a)(b)(1)(2) and Civ. Code. §52.1 (a)(b) the violations listed as Plaintiffs causes
11 of actions that each of the Defendants owe to Plaintiff as a citizen of the United States of
12 America, as provided by law and by California Civil Code §52 and §3294 et seq., Code Civ.
13 Proc., **1021.1 and 1021.5**, and California Penal Code §1202.4 an amount appropriately
14 sufficient for the purpose to punish Defendants for their conduct and to deter others from
15 engaging in similar misconduct of **Malice, Oppression, Fraud, etc ...;** in any further future
16 herein acts and to make an example out of Defendants and DOES 1 through 200 and for other
further relief as the court may deem just and proper as well as damages in the amount of **(Fifty**
Million Dollars) \$50,000,000.00¢ and **PLAINTIFF DEMANDS A TRIAL BY JURY.**

17 b) Wherefore, Plaintiff respectfully request that the Court enter judgement in his favor and
18 prays for judgment against all Defendants and each of them with the cost of this action as follows:

- 19 1. For Statutory Damages, not less than **\$4,000.00** per occurrence as afforded by Civil Code
20 §52(a). For violations on the date of each incident that injury occurred to Plaintiff;
21 2. Awarding Plaintiff General Damages in the sum of **(Fifty Million Dollars)**
22 \$50,000,000.00¢ and **PLAINTIFF DEMANDS A TRIAL BY JURY**, an amount in
23 excess of the jurisdictional threshold of this Court;
24 3. For Compensatory Damages in an amount to be proven at trial;
25 4. For Punitive Damages, in the sum of \$500,000,000; or Pursuant to Civil Code Section
26 §3294 in an amount appropriately sufficient for the purpose to punish Defendants for
27 their conduct and to deter others from engaging in similar misconduct of **Malice,**

Oppression, Fraud, etc ...; in any further future herein acts and to make an example out of Defendants and DOES 1 through 200;

5. For Treble Damages, Pursuant to Civil Code Section §§3333.4 in the sum of \$500,000,000; or Pursuant to Civil Code Section §§3294 and 3345 in an amount appropriately sufficient for the purpose to punish Defendants for their conduct and to deter others from engaging in similar misconduct of Malice, Oppression, Fraud, etc ...; in any further future herein acts and to make an example out of Defendants and DOES 1 through 200;
6. For Special and Consequential Damages, to the extent allowed by law in the sum of \$300,000,000.00¢; an amount in excess of the jurisdictional threshold of this Court;
7. For Monetary Damages in an amount to be proven at trial;
8. For Nominal Damages in an amount to be proven at trial;
9. For Exemplary Damages in an amount to be proven at trial; an amount appropriate for an amount appropriately sufficient for the purpose to punish Defendants for their conduct and to deter others from engaging in similar misconduct of Malice, Oppression, Fraud, etc ...; in any further future herein acts and to make an example out of Defendants and DOES 1 through 200;
10. For Economic Damages including past and future lost earnings, in an amount to be proven at trial;
11. That Defendants be ordered to pay Plaintiff's sum for Loss of Income and earnings capacity including both past and future lost earnings, in an amount to be proven at trial;
12. That Defendants be ordered to pay Plaintiff's sum for Non-Economic Damages including both past and future lost earnings, in an amount to be proven at trial;
13. Awarding Plaintiff fees and cost allowable by law;
14. Awarding Plaintiff cost of suit herein incurred allowable by law;
15. For cost of suit incurred herein by Plaintiff, in obtaining the benefits due Plaintiff and for violations of Plaintiff's Civil Rights as set forth above;
16. Pre-judgment interest, pursuant to Civil Code §3291 at the legal rate of 10% per annual from 11/20/2018 thru 11/20/2018 and Now at the time of this filing or Pursuant to Code of Civil Procedure §3287; and any and all other interest allowed as provided by law;

- 1 17. For Pre-judgment interest pursuant to **Civil Code §3291** and post-judgment interest at
2 the legal rate of **10% per annual from 11/20/2018 thru 11/20/2018 and Now at the**
3 **time of this filing** and any and all other interest allowed as provided by law;
- 4 18. For Attorney fees as provided by law and by Government Code Section **§12965 (b); 42**
5 **U.S.C. 1983, §§1985-1988, California Civil Code §52, Civ. Code. §52.1(a)(b) and**
6 **§3294 et seq.**, in an amount sufficient to deter any further future herein acts and to make
7 an example out of Defendants and DOES 1 through 200;
- 8 19. For Attorney fees as provided by law and by Government Code Section **§12965 (b); 42**
9 **U.S.C. §§12101 and 12102 et seq. and California Civil Code §3294 et seq.**, in an
10 amount sufficient to deter any further herein acts and to make an example out of
11 Defendants and DOES 1 through 200;
- 12 20. For Reimbursement of the cost, including attorney fees, as afforded under applicable law,
13 including but not limited to **Code Civ. Proc., §§998, 1021.1 and 1021.5**, and for a
14 contingency fee enhancement beyond the lodestar in accordance with **Ketchum vs.**
15 **Moses**, (2001) 24 Cal. 4th 1122, [104 Cal. Rptr. 2d 377] 17 P.3d 735 and related
16 authorities;
- 17 21. For Attorney fees as provided by law and by California Civil Code **§52; Civ. Code.**
18 **§52.1(a)(b) and §3294 et seq., Code Civ. Proc., 1021.1 and 1021.5**, and California
19 Penal Code **§1202.4** an amount appropriately sufficient for the purpose **to punish**
20 Defendants **for their conduct** and **to deter others** from engaging in similar misconduct
21 of **Malice, Oppression, Fraud, etc ...**; in any further future herein acts and to make an
22 example out of Defendants and DOES 1 through 200;
- 23 22. For a **Civil Penalty** of **§25,000.00** per occurrence as afforded by pursuant to **Civ. Code.**
24 **§52. (a)(b)(1)(2)** and, for a **Civil Penalty** of **§25,000.00** per occurrence as afforded by
25 pursuant to **Civ. Code. §52.1 (a)(b)**
- 26 23. For Joint and Severable Liability of all Defendants' and
27 24. That Judgement be entered in favor of Plaintiff;
28 25. Awarding Plaintiff for such other and further relief as the court my deem just, proper,
 appropriate and equitable in the premises.

1 **WHEREFORE**, for all of the foregoing reasons Plaintiff has stated a cause of action against
2 each of the Defendants, each of them, jointly and severally, in their individual and official capacities
3 and is entitled to awarding him general, special, punitive, compensatory, treble, monetary, nominal,
4 exemplary, economical, non-economic damages cost of suit herein, Pre-judgment interest, pursuant to
5 Civil Code §3291 at the legal rate of 10% per annual from 11/20/2018 thru 11/20/2018 and Now at
6 the time of this filing or Pursuant to Code of Civil Procedure §§3287-3289 and §3291; For Attorney
7 Fees as provided by law and by Government Code Section §12965 (b); 42 U.S.C. §1983 and Sections
8 §§1985-1988; §§ 12101 and 12102 et seq., as well as other damages as cited above-herein for a Civil
9 Penalty of \$25,000.00 pursuant to Civ. Code. §52. (a)(b)(1)(2) and Civ. Code. §52.1 (a)(b) the
10 violations listed as Plaintiffs causes of actions that each of the Defendants owe to Plaintiff as a citizen
11 of the United States of America, as provided by law and by California Civil Code §52, Civ. Code.
12 §52.1(a)(b) and §3294 et seq., Code Civ. Proc., 1021.1 and 1021.5, and California Penal Code
13 §1202.4 an amount appropriately sufficient for the purpose to punish Defendants for their conduct and
14 to deter others from engaging in similar misconduct of Malice, Oppression, Fraud, etc ...; in any
15 further future herein acts and to make an example out of Defendants and DOES 1 through 200 and for
16 other further relief as the court may deem just and proper as well as damages in the amount of (Fifty
17 Million Dollars) \$50,000,000.00¢ and PLAINTIFF DEMANDS A TRIAL BY JURY.

18 I declare under the penalty of perjury that all of the information, statements and allegations
19 alleged in this complaint are true, correct and complete and to those matters stated on information and
20 belief, I believe them to be true.

21 **DATED:** June 1st, 2023

Respectfully, submitted

BRIAN WILLIAM, PLAINTIFF, IN PRO SE

On behalf of himself, the general public and on Behalf of
22 all other persons and class similarly situated

DEMAND FOR JURY TRIAL

23 Plaintiff demands a trial by jury pursuant to Code of Civil Procedure §631 for himself, the
24 general public and on behalf of all other persons and class similarly situated, on all claims so triable.

25 **DATED:** June 1st, 2023

Respectfully, submitted

BRIAN WILLIAM, PLAINTIFF, IN PRO SE

On behalf of himself, the general public and on Behalf of
26 all other persons and class similarly situated

1 **PROOF OF CERTIFICATE OF SERVICE BY MAILBOX RULES**

2 (CCp §§1010.6, 1011, §1013(a), §2015.5; FRCP §5(b)(2)(c); FRAP §25(c)(1)(A); 28 U.S.C.A. §1746)

3 I declare that:

4 I am a citizen of the County of Los Angeles, State of California. I am a citizen of the United
5 States of America. I am a resident of the City of Town of Los Angeles, in the County of Los
6 Angeles, California. I am over the age of 18years. My temporary non-residence mailing address
is: **BRIAN WILLIAM, 3802 Rosecrans Street, Unit #22, San Diego, California 92110**

7 On the date of **June 1st, 2023**, I served via United States Mail a Copy of an **Original Filed**
8 Document of the following attached document(s): **FIRST AMENDED COMPLAINT FOR**
DAMAGES AND DEMAND FOR JURY TRIAL, on Respondent(s) or parties in this case.

9 The above-noted legal document(s) a true copy thereof was places in a sealed envelope, with
10 postage thereof fully prepaid, addressed to the person or parties at the address(es) as indicated below
11 pursuant to Cal. Civil Code §1013 for mailing in the U.S. mail in the town or City of: Los Angeles,
Ca.

12 I placed the envelope or package in a mailbox or other like facility address to the following:

13 **Attn: Clerk of the Los Angeles Superior Court**
14 **Room 102**
15 **111 North Hill Street**
16 **Los Angeles, California 90012**

17 **HONORABLE JUDGE ROBERT S. DRAPER**
18 **DEPARTMENT 78**
19 **111 North Hill Street**
20 **Los Angeles, California 90012**

21 I, declare under penalty of perjury under the laws of the State of California that the foregoing
22 allegations and statements stated are true and correct, too my belief and to the best of my knowledge
23 and as to those matters as I believe them to be true, and that this declaration was executed on **June**
24 **1st, 2023 in San Diego, California**

25 **BRIAN WILLIAM**
26 Type or Print Name

27 
28 Signature

TELEPHONE NO.: NONE

FAX NO. (Optional): NONE

ATTORNEY FOR (Name): IN PROPERIA PERSONA

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 NORTH HILL STREET

MAILING ADDRESS: 111 NORTH HILL STREET

CITY AND ZIP CODE: LOS ANGELES, CALIFORNIA 90012

BRANCH NAME: CENTRAL DISTRICT

CASE NAME:

BRIAN WILLIAM vs. FIRSTGROUP AMERICA, INC., et al

CIVIL CASE COVER SHEET

Unlimited
(Amount demanded exceeds \$25,000)

Limited
(Amount demanded is \$25,000)

Complex Case Designation

Counter Joinder

Filed with first appearance by defendant
(Cal. Rules of Court, rule 3.402)

CASE NUMBER:

JUDGE:
DEPT.

21STCV17514

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort

- Auto (22)
 Uninsured motorist (46)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

- Asbestos (04)
 Product liability (24)
 Medical malpractice (45)
 Other PI/PD/WD (23)

Non-PI/PD/WD (Other) Tort

- Business tort/unfair business practice (07)
 Civil rights (08)
 Defamation (13)
 Fraud (16)
 Intellectual property (19)
 Professional negligence (25)
 Other non-PI/PD/WD tort (35)

Employment

- Wrongful termination (36)
 Other employment (15)

Contract

- Breach of contract/warranty (06)
 Rule 3.740 collections (09)
 Other collections (09)
 Insurance coverage (18)
 Other contract (37)

Real Property

- Eminent domain/Inverse condemnation (14)
 Wrongful eviction (33)

Unlawful Detainer

- Commercial (31)
 Residential (32)
 Drugs (38)

Judicial Review

- Asset forfeiture (05)
 Petition re: arbitration award (11)
 Writ of mandate (02)
 Other judicial review (39)

Provisionally Complex Civil Litigation
(Cal. Rules of Court, rules 3.400-3.403)

- Antitrust/Trade regulation (03)
 Construction defect (10)
 Mass tort (40)
 Securities litigation (28)
 Environmental/Toxic tort (30)
 Insurance coverage claims arising from the above listed provisionally complex case types (41)

Enforcement of Judgment

- Enforcement of judgment (20)

Miscellaneous Civil Complaint

- RICO (27)
 Other complaint (not specified above) (42)

Miscellaneous Civil Petition

- Partnership and corporate governance (21)
 Other petition (not specified above) (43)

2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

- a. Large number of separately represented parties d. Large number of witnesses
 b. Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
 c. Substantial amount of documentary evidence f. Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive

4. Number of causes of action (specify): 10 +/- (give or take)

5. This case is is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: April 25th, 2021

BRIAN WILLIAM

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the Civil Case Cover Sheet contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the Civil Case Cover Sheet to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

Auto Tort

- Auto (22)–Personal Injury/Property Damage/Wrongful Death
- Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

- Asbestos (04)
- Asbestos Property Damage
- Asbestos Personal Injury/Wrongful Death
- Product Liability (*not asbestos or toxic/environmental*) (24)

Medical Malpractice (45)

- Medical Malpractice–Physicians & Surgeons

Other Professional Health Care Malpractice**Other PI/PD/WD (23)**

- Premises Liability (e.g., slip and fall)

Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)**Intentional Infliction of Emotional Distress****Negligent Infliction of Emotional Distress****Other PI/PD/WD****Non-PI/PD/WD (Other) Tort****Business Tort/Unfair Business Practice (07)****Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)****Defamation (e.g., slander, libel) (13)****Fraud (16)****Intellectual Property (19)****Professional Negligence (25)****Legal Malpractice****Other Professional Malpractice (*not medical or legal*)****Other Non-PI/PD/WD Tort (35)****Employment****Wrongful Termination (36)****Other Employment (15)****CASE TYPES AND EXAMPLES****Contract**

- Breach of Contract/Warranty (06)
- Breach of Rental/Lease
- Contract (*not unlawful detainer or wrongful eviction*)
- Contract/Warranty Breach–Seller Plaintiff (*not fraud or negligence*)
- Negligent Breach of Contract/Warranty
- Other Breach of Contract/Warranty
- Collections (e.g., money owed, open book accounts) (09)
- Collection Case–Seller Plaintiff
- Other Promissory Note/Collections Case
- Insurance Coverage (*not provisionally complex*) (18)
- Auto Subrogation
- Other Coverage
- Other Contract (37)
- Contractual Fraud
- Other Contract Dispute

Real Property

- Eminent Domain/Inverse Condemnation (14)
- Wrongful Eviction (33)
- Other Real Property (e.g., quiet title) (26)
- Writ of Possession of Real Property
- Mortgage Foreclosure
- Quiet Title
- Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

- Commercial (31)
- Residential (32)
- Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)
- Asset Forfeiture (05)
- Petition Re: Arbitration Award (11)
- Writ of Mandate (02)
- Writ–Administrative Mandamus
- Writ–Mandamus on Limited Court Case Matter
- Writ–Other Limited Court Case Review

Other Judicial Review (39)

- Review of Health Officer Order
- Notice of Appeal–Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

- Antitrust/Trade Regulation (03)
- Construction Defect (10)
- Claims Involving Mass Tort (40)
- Securities Litigation (28)
- Environmental/Toxic Tort (30)
- Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

- Enforcement of Judgment (20)
- Abstract of Judgment (Out of County)
- Confession of Judgment (*non-domestic relations*)
- Sister State Judgment
- Administrative Agency Award (*not unpaid taxes*)
- Petition/Certification of Entry of Judgment on Unpaid Taxes
- Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

- RICO (27)
- Other Complaint (*not specified above*) (42)
- Declaratory Relief Only
- Injunctive Relief Only (*non-harassment*)
- Mechanics Lien
- Other Commercial Complaint Case (*non-tort/non-complex*)
- Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

- Partnership and Corporate Governance (21)
- Other Petition (*not specified above*) (43)
- Civil Harassment
- Workplace Violence
- Elder/Dependent Adult Abuse
- Election Contest
- Petition for Name Change
- Petition for Relief From Late Claim

Other Civil Petition

SHORT TITLE: BRIAN WILLIAM vs. FIRSTGROUP AMERICA, INC., et al

CASE NUMBER

21STCV17514

**CIVIL CASE COVER SHEET ADDENDUM AND
STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.3 in all new civil case filings in the Los Angeles Superior Court.

Step 1: After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

Step 2: In Column B, check the box for the type of action that best describes the nature of the case.

Step 3: In Column C, circle the number which explains the reason for the court filing location you have chosen.

Applicable Reasons for Choosing Court Filing Location (Column C)

- | | |
|--|--|
| 1. Class actions must be filed in the Stanley Mosk Courthouse, Central District. | 7. Location where petitioner resides. |
| 2. Permissive filing in central district. | 8. Location wherein defendant/respondent functions wholly. |
| 3. Location where cause of action arose. | 9. Location where one or more of the parties reside. |
| 4. Mandatory personal injury filing in North District. | 10. Location of Labor Commissioner Office. |
| 5. Location where performance required or defendant resides. | 11. Mandatory filing location (Hub Cases – unlawful detainer, limited non-collection, limited collection, or personal injury). |
| 6. Location of property or permanently garaged vehicle. | |

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1, 4, 11
Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1, 4, 11
Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	1, 11 1, 11
Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1, 4, 11
Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1, 4, 11 1, 4, 11
Other Personal Injury/Property Damage/Wrongful Death Tort (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1, 4, 11 1, 4, 11 1, 4, 11 1, 4, 11

SHORT TITLE: BRIAN WILLIAM vs. FIRSTGROUP AMERICA, INC., et al		CASE NUMBER	
Non-Personal Injury/ Property Damage/ Wrongful Death Tort Employment Contract Real Property Unlawful Detainer	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1, 2, 3
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1, 2, 3
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1, 2, 3
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1, 2, 3
	Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1, 2, 3 1, 2, 3
	Other (35)	<input checked="" type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	1, 2, 3
	Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1, 2, 3
	Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1, 2, 3 10
	Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2, 5 2, 5 1, 2, 5 1, 2, 5
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case <input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11 5, 11 5, 6, 11
	Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1, 2, 5, 8
	Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1, 2, 3, 5 1, 2, 3, 5 1, 2, 3, 8, 9
	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation	Number of parcels _____ 2, 6
	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2, 6
	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6 2, 6 2, 6
	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer-Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2, 6, 11

SHORT TITLE: BRIAN WILLIAM vs. FIRSTGROUP AMERICA, INC., et al

CASE NUMBER

Judicial Review

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2, 3, 6
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2, 5
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2, 8 2 2
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ / Judicial Review	2, 8
Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1, 2, 8
Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1, 2, 3
Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1, 2, 8
Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1, 2, 8
Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1, 2, 3, 8
Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1, 2, 5, 8
Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2, 5, 11 2, 6 2, 9 2, 8 2, 8 2, 8, 9
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1, 2, 8
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1, 2, 8 2, 8 1, 2, 8 1, 2, 8
Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2, 8
Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment With Damages <input type="checkbox"/> A6123 Workplace Harassment With Damages <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case With Damages <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name/Change of Gender <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2, 3, 9 2, 3, 9 2, 3, 9 2 2, 7 2, 3, 8 2, 9

SHORT TITLE: BRIAN WILLIAM vs. FIRSTGROUP AMERICA, INC., et al	CASE NUMBER
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Step 4: Statement of Reason and Address: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

REASON:	ADDRESS:		
<input type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input checked="" type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11.	1716 E. 7th Street		
CITY: Los Angeles	STATE: Ca	ZIP CODE: 90021	

Step 5: Certification of Assignment: I certify that this case is properly filed in the CENTRAL District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., §392 et seq., and Local Rule 2.3(a)(1)(E)].

Dated: April 25th, 2021



(SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 02/16).
5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.